

IN THE FEDERAL DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OHIO

UNITED STATES OF AMERICA,

Plaintiff,

v.

DEON LEVY,

) CASE NO: 1:22:CR:227

)

) JUDGE: PAMELA BARKER

)

)

NOTICE OF SENTENCING MATERIALS

Defendant.

Now comes Defendant, DEON LEVY, and hereby submits the following materials in support of his sentencing hearing. 1. Letter from his twin sons Azeem and Ameer; and 2. Medical diagnosis sheet. See attached.

These materials will be referenced in Defendant's sentencing argument tomorrow.

Respectfully Submitted,

/s/ William B. Norman

William Norman (0088113)

WEB NORMAN LAW, INC.

22255 Center Ridge Road, Ste 311

Rocky River, OH 44116

Phone: (216) 487-7055

Fax: (216) 815-1788

Email: WillNorman@DefendingCleveland.com

Counsel for Defendant

CERTIFICATE OF SERVICE

The foregoing notice of sentencing material was delivered via the ECF to the following counsel of record on this 5 January 2023:

Elliot Morrison

Assistant US attorney
Northern District of Ohio

Respectfully Submitted,

/s/ William B. Norman
William Norman (0088113)

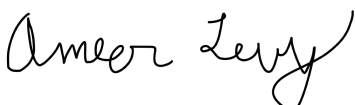
To Whom It May Concern:

My name is Ameer Levy and I am writing to speak to the character of my father, Deon Levy, and to share with you the depths of his love and dedication to his family. As his child, I have been fortunate to experience firsthand the love and care that he has always shown to us. My father has made a serious mistake a few years ago that cost him his reputation and many of his public relationships. It was a difficult time for our family, and it would have been easy for my father to become discouraged and lose sight of what was truly important. But through it all, my father remained strong and resilient, and he never let his mistakes define him. If anything, this difficult experience brought us closer as a family. We leaned on each other for support and love, and we realized that we are all we have. My father's love for his children knows no bounds, and he would do anything to protect and care for us. He has always been there for us, and I know that he would do anything to make things right.

Seeing my brother firsthand go through this experience was traumatic for me because with us just graduating college together and for this to come out it was a nuclear blast to our morale and relationship with him. We've could've easily made amends and went our separate ways but deep down I know he didn't make this decision with ill intentions to do his son harm. My father is a great teacher, and I have learned so much from him both in the trade of construction and in life. I am proud to call my father my role model, and I genuinely see him as a person of good character. His love and dedication to his family, combined with his business acumen and integrity, make him an outstanding individual.

Sincerely,

Ameer Levy

A handwritten signature in cursive script that reads "Ameer Levy". The signature is written in black ink and is positioned at the bottom left of the page, below the typed name "Ameer Levy".



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Name: DEON D LEVY
Date of Birth: 
Birth Sex: Male

Diagnoses

- HYPERTENSION NOS
- CONGESTVE HRT FAILUR NOS
- CARDIOMYOPATH IN OTH DIS
- PRIM CARDIOMYOPATHY NEC
- HYPERTENSION NOS
- Hypertensive emergency
- CHF (congestive heart failure)
- Noncompliance with treatment plan
- Troponin level elevated
- Hypertension
- CHF (congestive heart failure)
- NYHA class 2 and ACC/AHA stage C acute on chronic systolic congestive heart failure
- Congestive heart failure, hypertensive
- CHF (congestive heart failure)
- HTN (hypertension)
- CHF (congestive heart failure)
- Influenza
- Influenza A
- Accelerated hypertension
- Hypertensive urgency
- Chronic combined systolic and diastolic CHF, NYHA class 2 and ACA/AHA stage C
- Chronic combined systolic and diastolic CHF, NYHA class 2 and ACA/AHA stage C
- Cardiomyopathy
- Viral pharyngitis
- Ingrown toenail
- Acute dyspnea
- Epistaxis
- Anemia

- Gastric mass
- GIST (gastrointestinal stromal tumor), non-malignant
- DM (diabetes mellitus)
- Gastrointestinal stromal tumor (GIST)
- Malignant gastrointestinal stromal tumor
- Daytime somnolence
- Cardiomyopathy
- Hypertension
- DOE (dyspnea on exertion)
- Chronic combined systolic and diastolic congestive heart failure
- Astigmatism of both eyes
- Abnormal fasting glucose
- Body mass index (BMI) of 38.0 to 38.9 in adult
- LVH (left ventricular hypertrophy)
- Screening for colon cancer
- GIST (gastrointestinal stromal tumor), non-malignant
- Diastolic congestive heart failure
- Hyperopia with presbyopia of both eyes
- Obesity
- Cardiomyopathy
- Diabetes mellitus
- LDL-c greater than or equal to 100 mg/dl
- Vitamin D deficiency
- Finger laceration
- Class 2 severe obesity with serious comorbidity and body mass index (BMI) of 38.0 to 38.9 in adult, unspecified obesity type
- Thyroid disorder screen
- Nephropathy screen
- Prostate cancer screening
- GERD (gastroesophageal reflux disease)
- Elevated PSA
- Knee pain
- Colonoscopy planned
- Diastolic CHF
- Other dyspnea and respiratory abnormality
- Hyperplastic colon polyp

Allergies

- lisinopril - Unknown
- ACE inhibitors - Unknown
- ACE Inhibitors
- lisinopril

Medications

- spironolactone 25 mg oral tablet - 1 tab(s) oral once a day
- Carvedilol 25 Mg Tab Glen - TAKE 1 & 1/2 TABLETS BY MOUTH TWICE A DAY
- Furosemide 20 Mg Tab Solc - TAKE ONE TABLET BY MOUTH DAILY
- Spironolactone 25 MG Oral Tablet - Take 1 Tablet Daily.
- Losartan Potassium 100 MG Oral Tablet - Take One Tablet By Mouth Every Day.
- Carvedilol 25 MG Oral Tablet - Take 1 And 1/2 Tablets Twice Daily.
- Furosemide 20 MG Oral Tablet - Take 1 Tablet Daily.
- Pantoprazole Sodium 20 MG Oral Tablet Delayed Release
- Pantoprazole Sodium 40 MG Oral Tablet Delayed Release - Take One Tablet By Mouth Every Day.
- Ketorolac Tromethamine 0.5 % Ophthalmic Solution - Instill 1 Drop Into Affected Eye(s) 3 Times A Day.
- Enoxaparin Sodium 40 MG/0.4ML Subcutaneous Solution - Inject 40 Mg Under The Skin Once A Day.
- Tobramycin-Dexamethasone 0.3-0.1 % Ophthalmic Suspension - Instill 2 Drops Into Affected Eye(s) 4 Times A Day.
- traMADol HCl - 50 MG Oral Tablet - Take One Tablet By Mouth Every 4 To 6 Hours For 7 Days As Needed For Pain.
- Vitamin D3 Ultra Potency 1.25 MG (50000 UT) Oral Tablet - Take 1 Tablet Weekly For 12 Weeks.
- Losartan Pot 100 Mg Tab Camb
- metFORMIN - orally once a day
- pantoprazole - orally once a day
- hydrALAZINE 25 mg oral tablet - orally 2 times a day
- PEG 3350-KCl-Na Bicarb-NaCl 420 GM Oral Solution Reconstituted - Mix And Drink 4000 MI As Per Split Dose Uh Endoscopy Instructions.
- metFORMIN HCl - 500 MG Oral Tablet - Take 1 Tablet Twice Daily, With Morning And Evening Meal.
- Atorvastatin Calcium 40 MG Oral Tablet - Take One Tablet By Mouth Daily.
- hydrALAZINE HCl - 50 MG Oral Tablet - Take 1 Tablet Twice Daily.
- Trulicity 0.75 MG/0.5ML Subcutaneous Solution Pen-injector - 0.75 Mg Once A Week.

DISCLAIMER: This information is supplied from the patient's medical record via a patient portal. The medical provider is listed as the source. Items with a source of 'Patient-Entered' were added by the patient. This record may not be complete or up to date, and should not be used for providing medical advice. For an official copy of the individual's medical record, the patient (or custodian) must contact their medical provider.

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I recently had a discussion with my siblings, but especially my twin brother (my sister really did not have too much to say other than ask me if I was going to go to court and speak up about our father).

My twin brother and I were having a heated discussion about the ordeal that I have been going through these past months (or couple of years, whichever is appropriate). And my brother asked me: How do you really feel now about how dad got you involved in his business?

Well, at first, I was mad as all get out and didn't even want to talk to my father. I mean I just couldn't believe that he messed up like that and involved me in his business. Please, don't get me wrong. I know my father and I know that he doesn't always do things like most other fathers would do things. I mean, I know that my father is (was) definitely prone to cutting corners, but whatever my father did or does, he always kept that side of him away from us.

My father always made sure that his children had what they needed to be successful in life including attending college for a better life. It was always my dream to work with my father in his construction business and I thought I was learning the ropes of how to be success in all aspects of construction even in the aspect of dealing with banks.

As I said, my father has (had) two sides, the one that he shared with his colleagues and associates and the one that he shared with me and my siblings.

As I think back on it now, I was just in total shock when I came out of that bank and was arrested. Even after dealing with that drama, I remember trusting and relying on my father to deal with the situation. I can honestly say though, that because of my ordeal, I have learned that I must grow-up. I still love and need my father's guidance, but I must now put all of the lessons that my father has taught me and my sibling into action so that I wil never, ever, ever find myself in such a situation again.

For the first few months, although I believed that my father was going to fix things and make everything OK. But after a few weeks or months when things did not go away, I really didn't trust my father, I was really mad, and I didn't even want to talk with him any more. After I got over the anger, I began to understand that bad things happen even to good people and that my father never intended to involvement in any unsavory business. Even though I was angry. My siblings and I. (especially my twin brother) all realized how much we truly are dependent upon our father for guidance and wisdom.

I still want to have a career in the construction industry and I often find that I need my father's guidance or I feel that I will never be successful. If you make one slight avoidable error, it could mean the difference between paying the bills and facing bankruptcy. I hope to one day be wise enough to not need my father's close coaching, but that time is not today. Today he is very much needed by me.

I know that I am rambling, but I would like to say that I asked my father what really happened and he shared with me that although he did not know that what he was doing was not Kosher, he should have known and he should have pulled the plug and he should never have involved me. But that is all hindsight.

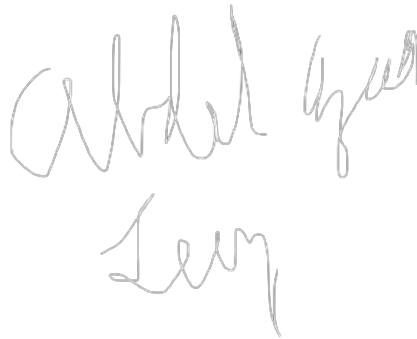
I still love my father and I do trust him, but this ordeal has taught us both a really valuable lesson. You really, really have to scrutinize everything. If something even remotely seems fishy, you must investigate. Trust, but verify that everything is on the up and up.

We lost our father for a long period of time in 2014-2017 and we didn't exactly fall all the way aper, but we were darn near close to it. I don't believe that we are going to fall all the

way apart, but we definitely still need our father's presence and his present guidance to really make a go of life successes.

My father is a really good man who has made some not so smart choices, but I'm certain that he, just like me, will go forward to be really productive citizens.

It can be difficult to bridge the gap between yourself and your father when trying to rebuild a healthy relationship. It helps to start small and be open to changes and compromises. My father showed me he was genuinely sorry, and willing to take responsibility for his past mistakes and that's most important towards having a better relationship. Ultimately, the two of us were open to forgiveness and were willing to take the time to invest in each other

A handwritten signature in cursive script, appearing to read "Abdul Ghafoor" on the top line and "Levy" on the bottom line.

and rebuild from the ground up.